

Department of Energy

Richland Field Office
P.O. Box 550
Richland, Washington 99352

9300250

JAN 2 1 1993

93-LWB-003

Mr. Paul T. Day Hanford Project Manager U.S. Environmental Protection Agency 712 Swift Boulevard, Suite 5 Richland, Washington 99352

Mr. David B. Jansen, P.E. Hanford Project Manager State of Washington Department of Ecology P.O. Box 47600 Olympia, Washington 98504-7600

Dear Messrs. Day and Jansen:

ESTABLISH NEW INTERIM HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE M-20-51

The T Plant Complex is currently being operated as a dangerous waste treatment and storage unit under interim status. The U.S. Department of Energy, Richland Field Office is proposing the establishment of a new interim Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone, M-20-51, for the submittal of the T Plant Complex Dangerous Waste Permit Application (Part B). A draft Tri-Party Agreement (TPA) Change Control Form reflecting this change is enclosed. The change will establish a date of December 31, 1995, for submission of the Part B to the State of Washington Department of Ecology and the U.S. Environmental Protection Agency.

We suggest that the proposed change request be formally dispositioned at the February 1993, Project Managers meeting inaccordance with our agreed upon approach to deal with TPA change requests in a more expeditious manner.



Messrs. Day and Jansen 93-LWB-003

Should you have any questions regarding this request, please call me on $(509)\ 376-6798$.

Sincerely,

WMD:MJF

Enclosure

cc w/encl:

B. A. Austin, WHC

R. C. Bowman, WHC
W. H. Hamilton, Jr., WHC
G. W. Jackson, WHC

R. E. Lerch, WHC H. E. McGuire, WHC

Manford Project Manager

Federal Facility Agreement and Consent Order Change Number Date Change Control Form M-20-92-8 Do not use blue ink. Type or print using black ink. Originator Phone M. J. Furman 376-7062 Class of Change [] I - Signatories [X] II - Project Manager [] III - Unit Manager Change Title Establish New Interim Milestone, M-20-51, for Submittal of T Plant Complex Part B Permit Application Description/Justification of Change Establish a Tri-Party Agreement Milestone M-20-51 to read "Submit T Plant Complex Part B Permit Application to Ecology and the EPA," December 31, 1995. JUSTIFICATION: Page 2 Impact of Change This change reflects the commitment to obtain a Part B permit application for the T Plant Complex. Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan-Appendix D, Table D-3 and Figure D-1. Approvals Disapproved Approved DOE Date

Date

Date

EPA

Ecology

JUSTIFICATION FOR DECEMBER 1995 SUBMITTAL OF THE T PLANT COMPLEX PART B PERMIT APPLICATION

The T Plant Complex currently is planning for the installation of Resource Conservation and Recovery Act (RCRA)-compliant double-walled tanks and ancillary equipment. The planned scope of this effort includes the T Plant Complex dangerous waste tanks, and associated waste transfer piping and instrumentation necessary to perform the T Plant Complex mission. The mission of the T Plant Complex is to perform decontamination services for the Hanford Site. The liquid waste generated during decontamination activities is collected in the T Plant Complex waste tank system. The installation of RCRA-compliant tanks will complete corrective action associated with deficiencies in the current tanks and piping system necessary for the continued operation of the T Plant Complex.

Project W-259 (T Plant Secondary Containment and Leak Detection Upgrades) has been initiated to upgrade the T Plant Complex and its operation by upgrading and/or replacing the existing dangerous waste tanks, piping, and operating control systems. The functional design criteria for Project W-259 are scheduled to be completed by June 1993. Also, a 'schedule of events' for completion of the T Plant Complex upgrades is to be completed by September 1993.

Submittal of the T Plant Complex Part B Permit Application in December 1995 will allow time to develop complete and technically correct design and operating data that are fully consistent with the future of the T Plant Complex.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

S. H. Wisness, RL
(B. M. Barnes, WHC)
(J. F. WIlliams Jr., WHC)

P. T. Day, EPA
D. B. Jansen, Ecology

Incoming: 9300250 XREF: 9258959D

Subject: ESTABLISH NEW INTERIM HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE M-20-51

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